



October 16, 2009

EPA Region 5 Records Ctr.



358848

Mr. Sam Chummar
Remedial Project Manager
U.S. Environmental Protection Agency
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604

**Subject: Technical Review Comments on "Multi-Area Field Sampling Plan" Revision 5
(Dated September 23, 2009)
Former Plainwell, Inc. Mill Property, Plainwell, Michigan
Contract No. EP-S5-06-02, Work Assignment No. 041-RSBD-059B**

Dear Mr. Chummar:

SulTRAC has reviewed the above-referenced document as part of its oversight activities for the former Plainwell Mill property in Plainwell, Michigan. The document is dated September 23, 2009, and was prepared by Conestoga-Rovers & Associates, Inc., (CRA) for Weyerhaeuser Company (Weyerhaeuser), the responsible party for the site. The document contains the latest revisions to the field sampling plan prepared in support of multiple field investigations and activities including the Phase II remedial investigation to be conducted at the Plainwell Mill site.

SulTRAC reviewed the document to assess its technical adequacy and to evaluate whether it is consistent with the Phase II remedial investigation work plan (Version 3) dated September 23, 2009, that was also prepared by CRA for Weyerhaeuser. SulTRAC's technical review comments on the field sampling plan are enclosed.

If you have any questions about this submittal, please call me at (312) 201-7491.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey J. Lifka".

Jeffrey J. Lifka
Project Manager

Enclosure

cc: Norvelle Merrill-Crawford, EPA Contracting Officer (letter only)
Ron Riesing, SulTRAC Program Manager (letter only)
David Homer, SulTRAC Ecological Risk Assessor
Eric Morton, SulTRAC Human Health Risk Assessor
Ray Mastrolonardo, P.G., SulTRAC Hydrogeologist
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ENCLOSURE

**TECHNICAL REVIEW COMMENTS ON
“MULTI-AREA FIELD SAMPLING PLAN”
REVISION 5 (DATED SEPTEMBER 23, 2009)
FORMER PLAINWELL INC. MILL PROPERTY
PLAINWELL, MICHIGAN**

(Three Pages)

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FORMER PLAINWELL INC. MILL PROPERTY
PLAINWELL, MICHIGAN**

SulTRAC has reviewed the above-referenced document as part of its oversight activities for the former Plainwell Mill property in Plainwell, Michigan. The document is dated September 23, 2009, and was prepared by Conestoga-Rovers & Associates, Inc., (CRA) for Weyerhaeuser Company (Weyerhaeuser), the responsible party for the site. The document contains the latest revisions to the field sampling plan (FSP) prepared in support of multiple field investigations and activities including the Phase II remedial investigation (RI) to be conducted at the Plainwell Mill site. SulTRAC reviewed the document to assess its technical adequacy and to evaluate whether it is consistent with the Phase II remedial investigation work plan (Version 3) dated September 23, 2009, that was also prepared by CRA for Weyerhaeuser. SulTRAC’s general and specific technical review comments on the document are presented below.

GENERAL COMMENTS

1. All comments on the Phase II RI work plan figures regarding inconsistencies pertaining to locations of previously collected samples also apply to Figures 2-2 through 2-4 in the FSP. Therefore, the FSP figures should be revised to match the work plan figures after the work plan figures are updated.
2. All comments on Tables 5.1 through 5.4 of the Phase II RI work plan regarding the types, locations, and number of samples to be collected also apply to Table 2-7 in the FSP. Therefore, the FSP table should be revised accordingly to match the work plan tables after the work plan tables are updated.

SPECIFIC COMMENTS

1. **Section 2.9.1, Page 31, Last Bullet.** The last bullet under Sampling Program 2 should say 0-2 feet “above” the water table not “below”.
2. **Section 2.9.2, Pages 32 through 36.** This section summarizes the Phase II RI activities to be conducted. This section should be revised to more clearly indicate where surface soil samples will be collected under sampling programs 1 and 2. In addition, the FSP does not discuss the Mill building inspections to be conducted in Area 2 and the visual inspections to be conducted at the former Quality Products and former Specialty Minerals buildings in Area 3 (Areas 3A and 3B, respectively). The

groundwater discussion for Area 3 (last bullet on Page 36) should also mention that well MW-19 will be sampled as part of the site-wide groundwater sampling program.

3. **Section 3.1, Page 38, Paragraph 1**. This section describes the sample designation scheme to be used during the Phase II RI. The example provided is for a groundwater sample. It is not clear how soil samples will be numbered to account for boring locations and depths. In addition, Section 4.4.4 of the FSP discusses quality assurance considerations and describes the types of quality control (QC) samples to be collected. For each type of QC sample, the text states that sample identification protocols are provided in Section 3.1. Section 3.1 should be revised to provide examples of QC sample designations discussed in Section 4.4.4.
4. **Section 6.1.6, Page 56, Paragraph 4**. The text discusses the decontamination activities to be conducted during the Phase II RI. The text states that decontamination activities for the investigation at OU-7 will occur at a decontamination pad constructed near the site entrance of the landfill (presumably OU-4). The text should be revised to state that a decontamination pad will be constructed at OU-7 so that potentially contaminated equipment will not leave the investigation site.
5. **Section 6.2.7, Page 59, Paragraph 3**. The text discusses handling soil generated during the Phase II RI. The text states that excess soil and samples produced during drilling operations will be temporarily stockpiled at each drilling site and placed on plastic liners. As the drilling activities are completed in each area, the temporary stockpile will be collected and placed in 55-gallon drums. The text should be revised to state excess soil will be placed directly into 55-gallon drums so that runoff from rain and vapors or wind blown particulates from stockpiled soil will not be an issue. This would also eliminate extra handling of soil.
6. **Standard Operating Procedure (SOP) F5**. This SOP pertains to direct-push drilling and associated soil sampling. Neither the SOP nor the Phase II RI work plan describes the specific direct-push sampling methods to be used (Macro Core, discrete sampler, dual tube, etc.). This information should be provided in the FSP, the Phase II RI work plan, or both documents.
7. **SOP-17**. This SOP pertains to vertical aquifer sampling (VAS). The sampling steps in the SOP start with number 21 so it is not clear if some steps are missing or if the sequence just needs to be renumbered. In addition, the actual VAS procedures to be used are not specified in the SOP or in the Phase II RI work plan. Steps 23 and 24 of the SOP refer to drive points, core barrel, and push ahead

sampler, and step 28 refers to collecting samples with a bailer. Based on the information provided in this SOP (and the absence of any references to hollow-stem auger drilling), VAS assumedly will be conducted using direct-push methods. Neither the FSP nor the Phase II RI work plan discusses VAS sampling in sufficient detail to verify the actual drilling and sampling procedures to be used. Moreover, no information appears regarding whether groundwater will be purged before the collection of each sample and what the purging requirements would be. This information should be provided in the FSP, the Phase II RI work plan, or both documents.